

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

**JONATHAN MATOS and
RAMON DIAZ**

)
) **Criminal No. 04-10237-NG**
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GOVERNMENT'S SECOND SUMMARY OF EXPERT TESTIMONY

Pursuant to Fed. R. Crim. P. 16(a)(1)(G), the government hereby discloses a written summary of the testimony of Det. Marc Lavoie ("Lavoie"). Lavoie will testify that the amount of narcotics seized in this case, coupled with the circumstances of their seizure, is consistent with drug distribution and not mere possession. The basis for his testimony will be his familiarity with narcotic sales through his more than thirteen years experience with the Massachusetts State Police.

Lavoie has been with the Massachusetts State Police since 1993. From 1997 through 2000, he was a member of the Narcotics Unit with Plymouth County Crime Prevention and Control Unit ("CPAC"). From 2002 through August 2004, he was assigned to the Bristol County CPAC in New Bedford focusing on homicide. In August 2004, he transferred to the Bristol County State Police Gang Unit and investigated, among other things, street level drug dealing in New Bedford.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Kimberly P. West
KIMBERLY P. WEST
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Kimberly P. West
Kimberly P. West
Assistant U.S. Attorney

Dated: May 4, 2006